



King County Water District No. 90
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Transmitted to CPPUpdates@kingcountv.gov

Growth Management Planning Council
c/o Mr. Paul Reitenbach, King County DDES

Subject: King County Water District No. 90 Comments on draft Countywide
Planning Policies

Dear Mr. Reitenbach:

Please accept for the public record from King County Water District No. 90, a special purpose water district serving approximately 18,000 people in the Renton/Issaquah urban and rural areas, the following comments on the updated draft King County Countywide Planning Policies.

It is Water District No. 90's position that water-sewer districts are very efficient and cost-effective providers of water and sewer utility services and provide strong examples of local government that works without taxes; rather, water-sewer districts are fee based and are proven to be a very effective providers of these services.

Consistent with the provisions of Chapter 36.70A, the Growth Management Act, and specifically, Chapter 36.70A.110(4), cities are only "in general" the appropriate providers of urban services. Therefore, we feel the CPPs, and specifically, PFS-3, should be revised to be consistent with State law or, preferably, eliminated completely from the CCP's as merely a redundant restatement of State law.

Providing unqualified preference to cities for the provision of water and sewer services in the UGA disrupts the historical build-out of existing, professionally managed and maintained special purpose districts that have already planned for and funded systems that provide urban level services within the UGA, doing an unneeded disservice to the customers within those districts' service areas and potentially thwarting the intent of the legislature.

Further, it must be noted that many newer cities must obtain voter approval before such cities can provide utility services (see RCW 35.92.070), in addition to Boundary Review Board approval (see Chapter 36.93 RCW). Therefore, we feel the CPPs should be qualified with the word "may" to allow cities to assume utility functions.

Please acknowledge receipt of these comments.

Respectfully submitted,

Thomas N. Hoffman
General Manager